

C DUKES SCOTT  
EXECUTIVE DIRECTOR

1401 Main Street, Suite 900  
Columbia, SC 29201



DAN F. ARNETT  
CHIEF OF STAFF

Phone: (803) 737-0800  
Fax: (803) 737-0801

DAWN M. HIPPIE  
DIRECTOR  
TELECOMMUNICATIONS, TRANSPORTATION, WATER/WASTEWATER

September 5, 2008

Ms. Marlene Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Subject: WC Docket No. 07-139

Dear Ms. Dortch:

Several carriers have filed petitions for forbearance from all or some FCC ARMIS reporting requirements. As the agency charged with representing the public interest of South Carolina in utility regulation for the major utility industries, the Office of Regulatory Staff ("ORS") does not oppose these carriers' efforts to eliminate outdated and unnecessary reporting requirements.

ORS does not believe the data produced in these reports is suitable to any present regulatory purpose. Although it is important to have relevant data in order to develop sound telecommunications policy, data should be collected from all wire line carriers. State Commissions, such as South Carolina, have the authority to request specific up-to-date information from carriers operating in their states.

ORS believes that regulations must keep pace with the changes in the telecommunications market and that regulations that serve no useful purpose should be eliminated. The Commission has before it an opportunity to remove a regulatory burden not shared by all competitive wire line carriers. ORS recommends that the Commission take advantage of this opportunity to eliminate the burden of unnecessary reporting.

Sincerely,

Dawn Hippie  
Director, Telecommunications, Transportation, Water and Wastewater